

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:  
ENRON CREDITORS RECOVERY  
CORP., *et al.*,  
  
Reorganized Debtors.

ENRON CREDITORS RECOVERY  
CORP.,  
  
Appellant,  
  
v.  
  
INTERNATIONAL FINANCE CORP.,  
*et al.*,  
  
Appellees.

Chapter 11  
Case No. 01-16034 (AJG)  
  
Jointly Administered

Adv. Pro. No. 03-93370 (AJG)

District Court  
Case No. 07-06597 (AKH)

**ORAL ARGUMENT REQUESTED**

**NOTICE OF APPELLEES' MOTION TO DISMISS APPEAL**

PLEASE TAKE NOTICE that, upon, the accompanying memorandum of law, the accompanying declaration of Stephen J. Shimshak under 28 U.S.C. §1746 and all other papers and proceedings in the above-captioned appeal (the "Appeal"), the appellees hereby move (the "Motion") before the Honorable Alvin K. Hellerstein, United States District Judge, at the United States District Court for the Southern District of New York (the "Court") for an order dismissing with prejudice the Appeal in its entirety pursuant to Federal Rules of Bankruptcy Procedure 8002 and 8011, and Federal Rule of Civil Procedure 54(b) (made applicable to this proceeding by Federal Rule of Bankruptcy Procedure 7054(a)), and granting such other relief as the Court may deem just and proper. The accompanying memorandum of law sets forth the basis for the Motion.

PLEASE TAKE FURTHER NOTICE that, pursuant to the July 30, 2007 Stipulation and Order Regarding Scheduling, the appellant shall serve and file with the Court its reply memorandum of law in opposition to the Motion and any documents relating thereto on or before August 27, 2007.

Appellees request oral argument on the Motion.

Dated: August 1, 2007

Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

By: /s/ Stephen J. Shimshak  
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